

# **EXHIBIT B**

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
GULFPORT DIVISION

REPUBLICAN NATIONAL  
COMMITTEE; MISSISSIPPI  
REPUBLICAN PARTY; JAMES PERRY;  
and MATTHEW LAMB,

*Plaintiffs,*

vs.

JUSTIN WETZEL, *in his official capacity as the clerk and registrar of the Circuit Court of Harrison County;* TONI JO DIAZ, BECKY PAYNE, BARBARA KIMBALL, CHRISTENE BRICE, and CAROLYN HANDLER, *in their official capacities as members of the Harrison County Election Commission;* and MICHAEL WATSON, *in his official capacity as the Secretary of State of Mississippi,*

*Defendants.*

**No. 1:24-cv-25-LG-RPM**

**DECLARATION OF MARGARET CIRALDO ON BEHALF OF THE LEAGUE OF WOMEN VOTERS OF MISSISSIPPI**

Pursuant to 28 U.S.C. § 1746, I, Margaret Ciraldo, hereby declare as follows:

1. I am over the age of 18, and I am competent to make this declaration. I provide this declaration based on my personal knowledge. I would testify to the facts in this declaration under oath if called upon to do so.
2. I am co-president of the League of Women Voters of Mississippi (“LWV-MS” or “the League”). In my capacity as co-president of LWV-MS, I am familiar with—and receive frequent updates and proposals for—the activities of LWV-MS.

3. LWV-MS is the Mississippi affiliate of the League of Women Voters of the United States (“LWWUS”), which was founded in 1920.
4. LWV-MS was founded in 1951 and is a non-partisan, member-based, grassroots organization. LWV-MS is a nonprofit 501(c)(4) membership organization.
5. Most of the League’s work is made possible by volunteers.
6. The LWV-MS is a nonpartisan civic organization that neither supports nor opposes any political party or candidate.
7. The mission of LWV-MS is to empower voters and defend democracy. LWV-MS aims to improve governance in Mississippi by engaging all Mississippians in the decisions that impact their lives. LWV-MS seeks to bring Mississippians into the civic process through community outreach and capacity building, voter registration and education, getting out the vote, and community-oriented policy advocacy. LWV-MS believes that hands-on work to safeguard democracy leads to civic improvement.
8. LWV-MS has five local Leagues: East-Central Mississippi (serving Meridian and Lauderdale County), Jackson-Area (serving Hinds, Madison, and Rankin Counties), Mississippi Gulf Coast (serving Hancock, Harrison, and Jackson Counties), Oxford-North Mississippi (serving Marshall, Union, Pontotoc, Calhoun, Yalobusha, Panola, Tate, Benton, Lee, and Desoto Counties), and Pine Belt (serving Hattiesburg and the surrounding area, Forrest, Jones, Covington, Pearl River, Jasper, Jefferson Davis, Marion, Smith, Simpson, Stone and Lamar Counties). Each local League is a member of the state League, and every local League member is a member of the state League.
9. LWV-MS has approximately 192 members, living in various communities across the state. A significant portion of LWV-MS’s members are eligible to vote absentee by mail

because they are over 65 years of age, and many of those eligible members have exercised their right to vote by absentee ballot.

10. LWV-MS regularly conducts voter service projects, including efforts to register voters, get out the vote, and educate the public on elections. Together with our nonpartisan partners, LWV-MS provides rides to the polls, knocks on doors and distributes educational flyers, calls hundreds of voters on Election Day, and assists and encourages those who vote by absentee ballot. These efforts occur at both the state and local levels. Local Leagues lead much of the LWV-MS's voter services work and local League members are essential to accomplishing voter services project goals.
11. LWV-MS's membership strongly encourages and advocates for absentee voting. For example, our members often urge those who are eligible to vote by absentee ballot, in part because doing so cuts down on election day lines and makes voting easier for all. Our members also assist voters with disabilities in casting their absentee ballots.
12. We promote [VOTE411.org](https://www.vote411.org), a national initiative of the League of Women Voters Education Fund ("LWVEF"). [VOTE411.org](https://www.vote411.org) is designed to provide all voters with the information they need to successfully participate in every election (local, state, and federal) because the League believes that laws and policies should reflect the values of the community. [VOTE411.org](https://www.vote411.org) also offers a Ballot Lookup Tool for voters to enter their addresses to find their local polling place and create a personalized voter guide to take with them on election day for in-person voting.
13. LWV-MS promotes [VOTE411.org](https://www.vote411.org) in Mississippi by providing digital resources on voter registration, voter ID, polling locations, and absentee voting. LWV-MS also compiles voter guides for local races and offers this information to Mississippians by sending

questionnaires to candidates, making telephone calls, and conducting research through electronic platforms.

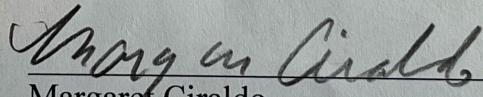
14. LWV-MS's educational material includes information about how and when to vote absentee. For example, LWV-MS distributes informational flyers, posts on its website and social media, and speaks to voters about the timeline for absentee voting, including Mississippi's post-election-day receipt deadline for mailed absentee ballots.
15. LWV-MS plans to continue all this voter outreach and education work in the coming years, including those efforts related to absentee voting.
16. This litigation seeks relief that would undermine the effectiveness of absentee voting and result in the disenfranchisement of many voters, including our members. LWV-MS is concerned about the impact of striking down Mississippi's post-election-day absentee ballot receipt deadline.
17. If plaintiffs are successful, LWV-MS members and voters across the state who vote absentee near to election day would be at a significantly increased risk of disenfranchisement. Voters have no control over how long their ballot will take to arrive by mail and would need to mail their ballots significantly earlier to minimize their chances of being disenfranchised. The current absentee deadline gives voters time to reach an informed decision by Election Day and offers much more predictability.
18. Further, if Plaintiffs succeed in striking down the absentee ballot receipt deadline, LWV-MS would need to expend significant resources toward updating voter education materials and trainings to raise awareness about the change in law and to warn voters that they face a higher risk of disenfranchisement if they vote by absentee ballot near to election day. This would require updating existing voter education materials that would

no longer be accurate and creating new materials and trainings to alert voters to the new deadline and its risks. VOTE411.org's educational offerings would need to be overhauled, and we would need to update our website and social media to ensure accuracy and emphasize the change in law.

19. LWV-MS has already devoted significant resources to preparing for the upcoming elections in Mississippi. If the Court were to grant Plaintiffs their requested relief, we would need to shift those resources away from registering voters, getting voters to the polls, and other forms of voter outreach in order to reallocate scarce funds and volunteer time toward educating voters about the elimination of the absentee ballot receipt deadline.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day 21<sup>st</sup> of February 2024.

  
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Margaret Ciraldo